

monitoring at non-ozone systems that use hypochlorite.

EPA requests comment on whether the criterion for reduced bromate monitoring should be set at a level other than 0.0025 mg/L, and a rationale for setting it at that level.

H. Initial Distribution System Evaluation (IDSE)

The IDSE is an important part of today's proposed regulation that is intended to identify sample locations for Stage 2B compliance monitoring that represent distribution system sites with high DBP concentrations.

1. What is EPA Proposing Today?

EPA is proposing a requirement for systems to perform an Initial Distribution System Evaluation (IDSE). Systems will collect data on DBP levels throughout their distribution system, evaluate these data to determine which sampling locations are most representative of high DBP levels and compile this information into a report for submission to the primacy agency.

a. *Applicability.* All community water systems, and large nontransient noncommunity water systems (those serving at least 10,000 people) that add a primary or residual disinfectant other than ultraviolet light, or that deliver water that has been treated with a primary or residual disinfectant other than ultraviolet light (*i.e.*, consecutive systems) are required to conduct an IDSE under the proposed rule. The IDSE requirement for systems serving fewer than 500 people may be waived if the State determines that the monitoring site approved for Stage 1 DBPR compliance is sufficient to represent both high HAA5 and high TTHM concentrations. The State must submit criteria for this waiver determination to EPA as part of their primacy application. States may decide to waive the IDSE requirement for all systems serving fewer than 500 or some subset of all systems serving fewer than 500 if the State determines that it is appropriate. EPA is developing an IDSE Guidance Manual that will include guidance to States on situations for which a waiver would be appropriate (USEPA 2003j).

b. *Data collection.* IDSEs are intended to help identify and select Stage 2B compliance monitoring sites that represent high concentrations of TTHMs and HAA5. To be able to identify these

sites, systems and States must have monitoring data collected from throughout their distribution systems. Therefore, under today's proposed rule, systems are required to collect monitoring data on the concentrations of these DBPs. There are three possible approaches by which a system can meet the IDSE requirement.

i. *Standard monitoring program.* The standard monitoring program requires one year of monitoring on a specified schedule throughout the distribution system. The frequency and number of samples required under the standard monitoring program is determined by source water type, number of treatment plants, and system size (see section V.J. for a more detailed discussion of the specific monitoring requirements). Prior to commencing the standard monitoring program, systems must prepare a monitoring plan. EPA's IDSE Guidance Manual will provide guidance on selecting monitoring sites and conducting the standard monitoring program (USEPA 2003j). As recommended by the Advisory Committee, EPA is proposing that the standard monitoring program results are not to be used for determining compliance with MCLs and that systems will not be required to report IDSE results in the Consumer Confidence Report.

ii. *System specific study.* Under this approach, systems may choose to perform a system-specific study based on earlier monitoring studies or other data analysis in lieu of the standard monitoring program. These studies must provide equivalent or better information than the standard monitoring program for selecting sites that represent high TTHM and HAA5 levels. Examples of alternative studies are: (1) Recent TTHM and HAA5 monitoring data that encompass a wide range of sample sites representative of the distribution system, including those judged to represent high TTHM and HAA5 concentrations and (2) hydraulic modeling studies that simulate water movement in the distribution system. Historical TTHM and HAA5 results submitted by systems must have been generated by certified laboratories and must include the system's most recent data. Treatment plant and distribution system characteristics at the time of historical data collection must reflect the current plant operations and distribution system. EPA's IDSE

Guidance Manual will include a guidance for system-specific studies and how to determine whether site-specific data could be sufficient to meet the IDSE requirements (USEPA 2003j).

iii. *40/30 certification.* Under this approach, systems certify to their primacy agency that all required Stage 1 DBPR compliance samples were properly collected and analyzed during the two years prior to the start of the IDSE, and all individual compliance samples were ≤ 0.040 mg/L for TTHM and ≤ 0.030 mg/L for HAA5. Properly collected and analyzed compliance samples are those taken at required locations at times specified in the system's Stage 1 DBPR monitoring plan and analyzed by certified laboratories. Systems not required to collect Stage 1 DBPR compliance samples can not utilize the 40/30 certification approach because they do not have data to determine sampling locations that represent high concentrations of TTHMs and HAA5. Systems that qualify for reduced monitoring for the Stage 1 DBPR during the two years prior to the start of the IDSE, may use results of both routine and reduced Stage 1 DBPR monitoring to prepare the 40/30 certification. Large ground water systems may not have two years of HAA5 data to evaluate due to the timing of the Stage 1 DBPR and the IDSE requirements. EPA is proposing that, if two years worth of HAA5 data are not available, large ground water systems evaluate the most recent two years of TTHM data including data collected in accordance with the 1979 TTHM rule and all available HAA5 compliance data collected up to nine months following promulgation of this rule when making the 40/30 certification. Similarly, small wholesale and consecutive systems required to submit their IDSE report no later than two years after publication of the final rule will evaluate all available Stage 1 DBPR compliance data collected up to nine months following promulgation.

c. *Implementation.* All systems subject to the IDSE requirement under the proposed rule (except those receiving a very small system waiver from the State) must submit a report to the primacy agency. The requirements for the report depend upon the IDSE data collection alternative that the system selects and are listed in Table V-2.